



## **Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template**

### **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013.

1. Date filed: 2/26/2014
2. Name of company(s) covered by this certification: Clay County Rural Telephone Cooperative, Inc.  
dba Endeavor Communications.
3. Form 499 Filer ID: 803472
4. Name of signatory: Ralph Cunha
5. Title of signatory: President, CEO
6. Certification:

I, Ralph Cunha, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: \_\_\_\_\_

A handwritten signature in black ink that reads 'Ralph Cunha' is written over a horizontal line.

**Attachments:** Accompanying Statement explaining CPNI procedures



## STATEMENT OF CPNI PROCEDURES

Clay County Rural Telephone Cooperative, Inc. d/b/a Endeavor Communications (Endeavor), has established operating procedures that ensure compliance with the Federal Communications Commission (FCC) regulations concerning the protection of customer proprietary network information (CPNI).

- Endeavor provides training and a written manual for all of its employees with access to CPNI regarding the appropriate use of CPNI. All training of current Endeavor employees is conducted by the Endeavor CPNI Compliance Officer (Ruth Cavell, Director of Customer Service/Sales) on a scheduled basis. All appropriate Endeavor employees completed CPNI training in September and October of 2012. The next training for all appropriate Endeavor employees will be in 2014.
- All trained employees have been notified of the FCC's regulations regarding CPNI and disciplinary procedures have been established should any employee violate CPNI regulations as stated in Endeavor's Manual.
- All new employees are shown a Power Point slideshow as their preliminary CPNI training by the Director of Human Resources (Elizabeth Cheatham) at the time of their new hire orientation.
- Endeavor maintains records of all marketing campaigns including a description of the medium used; details of CPNI, if any, used in the campaign; and what products and services were offered as part of the campaign. Thus far, Endeavor has not done any targeted marketing of products and services using CPNI. The Director of Marketing and Business Development (Marci Hefley) approves all marketing materials in accordance with CPNI regulations.
- All new customers receive a document explaining the FCC requirements and CPNI regulations. We require each customer to create a CPNI password for his/her account. This document also gives our customers the opportunity to be excluded from receiving targeted marketing materials about products outside our existing business relationship with them.
- Biennially, Endeavor mails a CPNI Opt-Out Notice to all customers. This notice explains the CPNI process and gives customers the opportunity to opt-out of targeted marketing. The last notice was mailed on October 29<sup>th</sup>, 2012. The next notice will be mailed to all Endeavor customers in October of 2014.
- Customers who have 'opted out' are noted as such on their accounts in our NISC billing software system. A field on their account is populated/marked and this field is easily reported from to ensure that marketing materials are sent in compliance with the FCC Opt Out procedures.
- All Endeavor customers must provide a CPNI password in order to receive detailed information about their account. If they are not able to provide the password, they are asked to answer two security questions (previously established by the account holder). If they are not able to give accurate answers, they are not given access to CPNI.
- In the event of a CPNI breach, the CPNI Compliance Officer is notified immediately and she files the breach appropriately.

February 26, 2014  
Ruth Cavell  
Director of Customer Service/Sales  
Endeavor Communications  
800-922-6677